

# Buchanan

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**VIA ECF**

The Honorable Chief Judge Matthew W. Brann  
U.S. District Court for the  
Middle District of Pennsylvania

**Re: Joint Request for Court Referral to Mediation**  
*Denise Shivery v. The Pennsylvania State University,*  
**Case No. 4:22-cv-00873-MWB**

Dear Chief Judge Brann:

The Parties, through their counsel, write jointly to respectfully request that this Honorable Court refer the instant matter to mediation with the Honorable Magistrate Judge Martin C. Carlson.

Having conducted limited discovery, the Parties have agreed to explore possible resolution of this matter by way of mediation prior to incurring additional costs. The Parties further request that this Honorable Court institute a short stay or extension of all deadlines as set forth in the Case Management Order dated August 30, 2022 (ECF No. 15) (“CMO”). The Parties agree that a short stay or extension of deadlines would encourage an amicable resolution, while also allowing the Parties to avoid unnecessary litigation costs.

The Parties are prepared to participate in a telephone conference call with the Court pursuant to Paragraph 22 of its CMO, and to make this request by formal motion and briefing in the event that Your Honor prefers additional information.

Respectfully submitted,



Thomas G. Collins

cc: Rahul Munshi (via ECF)  
*Counsel for Plaintiff*